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9 *Attorneys for Manulife Investment Management*
10 *and The Manufacturers Life Insurance Co.*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 In re PG&E CORPORATION

15 -and-

16 PACIFIC GAS AND ELECTRIC COMPANY,

17 Debtors

18 Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

**OPPOSITION TO REORGANIZED
DEBTORS' FOURTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY
THE STATUTE OF REPOSE)**

Hearing Information:

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances
Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Related to Dkt. Nos. 11339, 11340, 11341

1 Manulife Investment Management and The Manufacturers Life Insurance Co. (together,
2 “Manulife”) hereby respectfully submit this Opposition to Reorganized Debtors’ Fourteenth
3 Securities Claims Omnibus Objection [Dkt. No. 11339].¹

4 **OPPOSITION**

5 Manulife respectfully joins in the substantive Oppositions already on file to the Debtors’
6 Eleventh Securities Claims Omnibus Objection [including Dkt. Nos. 11168 and 11170]. The
7 Eleventh Securities Claims Omnibus Objection is identical in all material respects to the Fourteenth
8 Securities Claims Omnibus Objection. [See Exhibit 1 attached (redlined comparison of Eleventh
9 and Fourteenth Securities Claims Omnibus Objections)]. In addition, Manulife states that it did not
10 submit all its claims herein exclusively under Section 11 of the Securities Act and therefore the
11 Statute of Repose does not bar the compensation to which Manulife is entitled arising from any
12 other basis.

13 **RESERVATION OF RIGHTS**

14 Manulife reserves all its respective rights, claims, defenses, and remedies, including,
15 without limitation, the right to amend, modify or supplement this Opposition in accordance with
16 applicable rules.

17
18 Date: October 26, 2021



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28 ¹ The applicable claim number and other information for Manulife is attached hereto as **Appendix A.**

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Elizabeth Gilbert

M. Elizabeth Graham

APPENDIX A

CREDITOR	CLAIM NO.	DATE	AMOUNT OF CLAIM	NOTICE ADDRESS
Manulife Investment Management	101020	4/16/2020	Unliquidated	Manulife Investment Management Attn: Mr Sinclair Jacinto 200 Bloor Street East, Toronto, ON, M4W 1 E5